

THE ANTHONY POPE LAW FIRM, P.C.

60 Park Place, Suite 703

Newark, New Jersey 07102

(973) 344-4406

Attorneys for Defendant, Quawee Jones

UNITED STATES

Plaintiff,

v.

QWAWEE JONES

Defendant.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
MAGISTRATE NO.: 15-6234

Criminal Action

**NOTICE OF MOTION TO BE
RELIEVED AS COUNSEL**

To:

The Honorable Steven C. Mannion

United States District Court District of New Jersey

50 Walnut Street

MLK 2B

Newark, New Jersey 07101

Robert L. Frazer, Esq.

Office of the US Attorney

970 Broad Street

Suite 700

Newark, NJ 07102

Clerk's Office (Criminal)

United States District Court District of New Jersey

50 Walnut Street

Newark, NJ 07101

Quawee Jones

Essex County Correctional Facility

354 Doremus Ave,

Newark, NJ 07105

Dear Sirs,

PLEASE TAKE NOTICE that on the next available date, The Anthony Pope Law Firm, P.C., attorney for Defendant, Quawee Jones, shall move before The Honorable Steven C. Mannion, at the United States District Court of New Jersey, located at 50 Walnut Street Newark, NJ, for an Order relieving The Anthony Pope Law Firm, P.C. as counsel for Defendant, Quawee Jones, in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that in support of the within application, counsel shall rely upon the annexed Certification.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Respectfully Submitted,
THE ANTHONY POPE LAW FIRM, P.C.



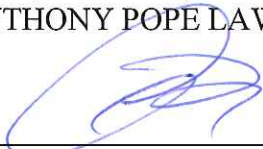
ANTHONY POPE, ESQ.

Dated: April 27, 2016

CERTIFICATION

I hereby certify that the issues raised by this Motion cannot be informally resolved.

Respectfully Submitted,
THE ANTHONY POPE LAW FIRM, P.C.



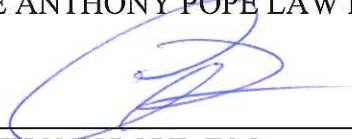
ANTHONY POPE, ESQ.

Dated: April 27, 2016

CERTIFICATION OF SERVICE

I certify that the original and two (2) copies of the within Notice of Motion have been filed with the Federal District Court of New Jersey Clerk's Office, and copies have been served upon the Defendant, Quawee Jones, via Certified and Regular Mail, and all other parties to this action via electronic filing.

Respectfully Submitted,
THE ANTHONY POPE LAW FIRM, P.C.



ANTHONY POPE, ESQ.

Dated: April 27, 2016

THE ANTHONY POPE LAW FIRM, P.C.

60 Park Place, Suite 703

Newark, New Jersey 07102

(973) 344-4406

Attorneys for Defendant, Quawee Jones

STATE OF NEW JERSEY

Plaintiff,

v.

QUAWEE JONES

Defendant.

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

MAGISTRATE NO.: 15-6234

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CERTIFICATION OF COUNSEL IN
SUPPORT OF NOTICE OF MOTION TO
BE RELIEVED AS COUNSEL

I, Anthony Pope, of full age, hereby certify as follows:

1. I am an attorney at law in the State of New Jersey and the principal with The Anthony Pope Law Firm, P.C., attorneys for Defendant, Quawee Jones, in the above-captioned matter. As such, I am familiar with the facts and circumstances surrounding the present application.
2. The defendant retained this Firm to represent him in connection with the above-captioned matter.
3. Upon acquisition of Mr. Jones as a client, this Firm clearly set forth the terms upon which were necessary in order to provide effective counsel.
4. The representations made due to the charges and potential life sentence if convicted, private counsel was sought.
5. It was represented to us that funds would be made available by pooling resources from friends and family.

6. The Firm reasonably set forth provisions to allow an installment plan which as of April 14th, 2016, is in arrears.
7. The terms set forth within the retainer clearly stipulate that in order to defend against an 18 U.S.C. §1952, racketeering charge Mr. Jones was to provide at the very minimum, enough financial resources to review the necessary documentation in addition to the acquisition of any and all defenses sought through investigation. The resources necessary, needed to be enough to mount a defense to counter the mountainous resources that the State has available to it.
8. To date, Mr. Jones has not fulfilled the terms of the retainer has left the Firm without enough resources to adequately and effectively defend him against the present charges. Also, in light of same, there has been an irreconcilable breakdown in the attorney-client relationship.
9. Thus, it is the Firms position that it is in the best interest of Mr. Jones to reapply for a Federal Public Defender who not only has the full capability to adequately and effectively defend Mr. Jones, but the financial resources provided to it, necessary to sustain a case of such brevity.
10. It is respectfully requested that this Court grant The Anthony Pope, P.C.'s motion to be relieved as counsel for Defendant, Quawee Jones.

I hereby certify that the foregoing statements made by me are true. I am aware that if the foregoing statements made by me are willfully false, I am subject to punishment.

Respectfully Submitted,
THE ANTHONY POPE LAW FIRM, P.C.



ANTHONY POPE, ESQ.

Dated: April 27, 2016

THE ANTHONY POPE LAW FIRM, P.C.

60 Park Place, Suite 703

Newark, New Jersey 07102

(973) 344-4406

Attorneys for Defendant, Quawee Jones

STATE OF NEW JERSEY

Plaintiff,

v.

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Defendant.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
MAGISTRATE NO.: 15-6234

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**ORDER RELIEVING THE ANTHONY
POPE LAW FIRM, P.C. AS COUNSEL
OF RECORD**

THIS MATTER having been opened to the Court by The Anthony Pope Law Firm, P.C., attorneys for Defendant, Quawee Jones, and notice having been sent to Defendant, Quawee Jones, and the Court having read the papers submitted, heard oral argument, and for good cause having been shown; it is therefore

On this ____ day of _____, 2016,

ORDERED that counsel's motion to be relieved as counsel be and hereby is granted; and it is further,

ORDERED that The Anthony Pope Law Firm, P.C. be and hereby is relieved as counsel for Defendant, Quawee Jones, in this matter; and it is further,

ORDERED that a copy of this Order be served upon all parties to this action within seven (7) days of the date of this Order.

THE HONORABLE STEVEN C. MANNION